



**U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION REPORT**

I. HEADING

Date: November 22, 2004

Subject: Barry Bronze Bearing Inc.
Camden, Camden County, New Jersey
Removal Action: RV2

From: Mark P. Pane, OSC
Removal Action Branch

To:	R. Salkie, EPA	D. Karlen, EPA
	G. Zachos, EPA	C. Turner, City of Camden
	J. Rotola, EPA	J. Smolenski, NJDEP
	M. Mears, EPA	P. Zammit, EPA
	T. Grier, 5202G	A. Block, ATSDR
	J. Fajardo, EPA	RST

POLREP NO. : 2 [11/13/04 - 11/19/04] RV2

II. BACKGROUND

Site No:	UX
CERCLIS No:	NJC200400018
Response Authority:	CERCLA
NPL Status:	Not Listed or proposed
ROD Signed:	Not applicable
State Notification:	NJDEP Notified
Start Date:	October 12, 2004
Completion Date:	Ongoing
Status of Action Memorandum:	Signed on September 16, 2004
Delivery Order Number:	EP-W-04-054-02

III. SITE INFORMATION

- I The Barry Bronze Bearing (BBB) Company Site is located at 2204 South 7th Street, Camden, New Jersey 08104. The Site is approximately 0.6 acres in size and contains a 19,000 ft² industrial building which occupies approximately 80% of the property. The balance of the property is paved and was utilized for parking. The Site is accessed from 7th Street along its western boundary which is a residential setting with a church located at the corner. South of the Site are additional residences located on Florence Street. Adjacent to the Site to the

East is a large warehouse complex operated by the City of Camden's Department of Education, and to the north lies Bulson Street and an active railroad. Bulson Street is an un-paved City Street. North of Bulson Street is a 5 acre parcel of land owned by the City of Camden that is currently being developed for low income residential housing. A new housing development is located to the north-west of the Site.

BBB operated at this location from 1928 until operations were terminated in August, 1997. They manufactured a variety of metal castings which were made of different alloys. Spent foundry sands from the casting process were dumped behind the building along Bulson Street as road fill.

Approximately 150 soil samples in all were collected along Bulson Street as part of the RSE. The results of the sampling indicate that lead contaminated soil in proximity to the BBB building along Bulson Street exists in significant concentrations and then diminishes eastward away from the building. The average concentration for lead in proximity to the BBB building was 3,058 ppm. Concentrations east of the BBB building averaged only 539 ppm. TCLP analysis of soil in proximity to the BBB building yielded results as high as 287 mg/l of lead. The lead contamination existing at the surface of the street, the uncontrolled access through this area by local residents and the fact that an active rail road line bisects this area pose a significant threat requiring mitigation.

IV. RESPONSE INFORMATION

A. Planned Response Actions

The planned scope of work for this action is to excavate and dispose of lead contaminated soil which exists along the surface of Bulson Street. The excavation will be based on data obtained during the RSE and also limited in depth to satisfy the safety requirements of the buried utilities (gas, electric and fiber optic) which underlie the area as well the proximity to the active rail line which bisects Bulson Street.

B. Situation

1. Current situation

During this period, excavation activities in Grids A1, B1, A2, B2, A3 and B3 were completed. A total of 343 cubic yards of contaminated soil was excavated this period, raising the total amount of soil excavated to date to 408 cubic yards.

2. Response activities to date: November 13 through 19, 2004

The excavation area has been divided into 9 grids, 6 south of the train tracks and the remaining 3 are north of the train tracks. The excavation depth ranges from 12 to 18 inches deep and span roughly 335 feet east of 7th Street on both the north and south sides of the train tracks which bisect Bulson Street. Please see attached diagram for reference.

Excavation activities continued this period south of the railroad tracks with each of the 6 grids being completed. The following chart characterizes the activities in each grid.

GRID NUMBER	DATE COMPLETED	VOLUME OF SOIL EXCAVATED (YD ³)
A1	November 15, 2004	104.2
A2	November 15, 2004	48.8
B1	November 16, 2004	47.5
B2	November 17, 2004	57.4
A3	November 18, 2004	101.8
B3	November 18, 2004	48.9
TOTAL		408.6

The excavated soil was staged in segregated piles along the south side of the tracks. Soil Pile 1, comprised of excavation A1 and B1 material was staged at the east end of the Site. Soil Pile 2, comprised of excavation A2 and B2 material was initially staged in Area A3 but was subsequently moved to A1 to facilitate excavation of A3. Soil Pile 3, comprised of excavation A3 and B3 material, was staged in Area A2. Composite samples were collected from each pile and are being analyzed to see if they fail TCLP for lead.

Excavation in Grid A2 uncovered a manhole cover to an active sewer system. The structure was not damaged and the cover was replaced. The area was demarcated for future reference. The sewer appears to be combined system carrying stormwater as well as sanitary waste from the adjacent building.

On November 15, 2004, Conrail was unable to provide a flagman to support field activities. As a result, activities on that day were restricted

to the area outside the 15 foot "no fouling zone" established in the access agreement with Conrail.

On November 17, 2004, the owner of the BBB facility finalized the revised access agreement with EPA. The new agreement updates the prior version to include utilization of the facility parking lot to house the command post.

On November 18, 2004, field activities were suspended while Conrail implemented a repair to the track in Grid B3. Wire welded to adjoining pieces of track came loose either from our activities or from freight trains which passed earlier in the day. The broken wire caused a failure of an electrical circuit which resulted in the train alert system being activated. The Conrail crew which implemented the repair indicated that this type of problem is a routine occurrence due to the age of the track.

On November 19, 2004, the first roll off box filled with debris generated from the initial surficial clean up along the train tracks was removed from the site.

Air monitoring was conducted each day of this period to evaluate the impact of field activities on local air quality. Two downwind and one upwind location were selected and each was equipped with a dataRam 4000 and an SKC pump. The dataRams are used to monitor the real time particle concentration of any airborne particulate matter as well as mean particle size, temperature and relative humidity data. The SKC pumps collect air samples on filter paper which can be analyzed should any elevated particulates be detected with the data rams. Any analysis of the filter paper would include testing for lead which is the primary contaminant of concern in the soil. During this period, no air quality issues were observed.

Armed, off hours security was maintained on site during all non-working hours. No incidents were reported this period.

3. Enforcement

The owner of the BBB facility has been very cooperative with EPA. Formal access to conduct an RSE on the property was granted on March 23, 2004. On October 26, 2004, EPA issued a Notice of Potential Liability and Request for Information to the owner. The owner has stated that he is financially incapable of performing the planned mitigation actions. A decision to pursue the BBB owner or other potential PRPs for

cost recovery actions is being evaluated by EPA.

C. Next Steps

EPA will evaluate data collected from the soil piles generated to date and select an appropriate disposal facility in compliance with the EPA off Site disposal rule. Excavation of Grids C1, C2 and C3 will commence next week.

D. Key Issues

The excavation activities must proceed very cautiously due to the presence of buried gas, electric, sewer and fiber optic lines. An overhead power line along the south side of Bulson Street also exists. In addition, the access agreement with Conrail precludes staging any material within 15 feet of the center line of the track. A Conrail flagman must also be used each day excavation activities occurs. Activity must stop while trains pass by the Site which occurs usually twice daily. Conrail flagmen are not always available and on days when they are not, excavation activities can not take place normally. In addition, the Site has limited storage space which has required double handling of soil piles to complete excavation activities. Each of these factors serve to impede the pace at which field activities can occur.

Armed security guards are necessary safeguard the Site during off hours.

V. COST INFORMATION for RV2 only (As of, November 19, 2004)¹

	Current Budget ²	Cost to Date³	Amount Remaining
ERRS	\$300,000	\$82,444	\$217,556
RST	\$75,000	\$10,523	\$64,477
EPA	\$100,000	\$16,000	\$84,000
CONTINGENCY	\$92,000	\$0	\$100,000
TOTAL	\$567,000	\$108,967	\$466,033

1. The cost accounting documented above is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.
2. ERRS funding for this action was approved under procurement request with DCN# HE-

0305, dated September 27, 2004, in the amount of \$300,000. RST, EPA and contingency budgets provided as part of action memo dated September 16, 2004.

3. RST cost based on loaded estimated hourly rate of \$72/hour. EPA cost based on loaded estimated hourly rate of \$100/hour. ERRS cost are reported directly from corresponding 1900-55.

VI. DISPOSITION OF WASTES (During this Reporting Period)

Type of Waste	Quantity	Disposal Facility	Treatment	Shipment Date	Manifest Numbers
Debris (Non-haz)	30 yd3	South Jersey Sanitation	Landfill	11/19/04	N/A